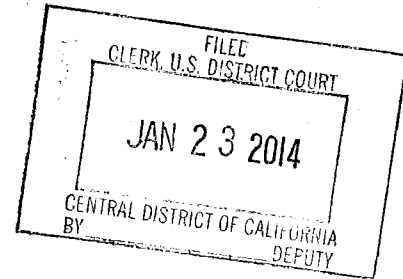


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8



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UNITED STATES OF AMERICA  
10

11 UNITED STATES DISTRICT COURT

12 FOR THE CENTRAL DISTRICT OF CALIFORNIA

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 KAREN AHARONIAN,  
aka "Michael 3,"

17 Defendant.  
18

No. CR 14-CR14-0041  
GOVERNMENT'S NOTICE OF REQUEST  
FOR DETENTION

19 Plaintiff, United States of America, by and through its counsel  
20 of record, hereby requests detention of defendant and gives notice  
21 of the following material factors:

22 1. Temporary 10-day Detention Requested (§ 3142(d)) on the  
23 following grounds:

24 a. present offense committed while defendant was on  
25 release pending (felony trial), (sentencing),  
26 (appeal), or on (probation) (parole); or  
27  
28

- 1        \_\_\_\_\_ b. defendant is an alien not lawfully admitted for  
2                       permanent residence; and  
3        \_\_\_\_\_ c. defendant may flee; or  
4        \_\_\_\_\_ d. pose a danger to another or the community.

5        X     2. Pretrial Detention Requested (§ 3142(e)) because no  
6                       condition or combination of conditions will reasonably  
7                       assure:

- 8        X     a. the appearance of the defendant as required;  
9        X     b. safety of any other person and the community.

10        \_\_\_\_\_ 3. Detention Requested Pending Supervised Release/Probation  
11                       Revocation Hearing (Rules 32.1(a)(6), 46(d), and 18 U.S.C.  
12                       § 3143(a)):

- 13        \_\_\_\_\_ a. defendant cannot establish by clear and convincing  
14                       evidence that he/she will not pose a danger to any  
15                       other person or to the community;  
16        \_\_\_\_\_ b. defendant cannot establish by clear and convincing  
17                       evidence that he/she will not flee.

18        \_\_\_\_\_ 4. Presumptions Applicable to Pretrial Detention (18 U.S.C.  
19                       § 3142(e)):

- 20        \_\_\_\_\_ a. Title 21 or Maritime Drug Law Enforcement Act  
21                       ("MDLEA") (46 U.S.C. App. 1901 et seq.) offense with  
22                       10-year or greater maximum penalty (presumption of  
23                       danger to community and flight risk);  
24        \_\_\_\_\_ b. offense under 18 U.S.C. §§ 924(c), 956(a), 2332b, or  
25                       2332b(g)(5)(B) with 10-year or greater maximum  
26                       penalty (presumption of danger to community and  
27                       flight risk);  
28

1 c. offense involving a minor victim under 18 U.S.C.

2 §§ 1201, 1591, 2241, 2242, 2244(a)(1), 2245, 2251,  
3 2251A, 2252(a)(1)-(a)(3), 2252A(a)(1)-2252A(a)(4),  
4 2260, 2421, 2422, 2423 or 2425 (presumption of danger  
5 to community and flight risk);

6 d. defendant currently charged with an offense described  
7 in paragraph 5a - 5e below, AND defendant was  
8 previously convicted of an offense described in  
9 paragraph 5a - 5e below (whether Federal or  
10 State/local), AND that previous offense was committed  
11 while defendant was on release pending trial, AND the  
12 current offense was committed within five years of  
13 conviction or release from prison on the above-  
14 described previous conviction (presumption of danger  
15 to community).

16 5. Government Is Entitled to Detention Hearing Under

17 § 3142(f) If the Case Involves:

18 a. a crime of violence (as defined in 18 U.S.C.  
19 § 3156(a)(4)) or Federal crime of terrorism (as  
20 defined in 18 U.S.C. § 2332b(g)(5)(B)) for which  
21 maximum sentence is 10 years' imprisonment or more;

22 b. an offense for which maximum sentence is life  
23 imprisonment or death;

24 c. Title 21 or MDLEA offense for which maximum sentence  
25 is 10 years' imprisonment or more;

\_\_\_\_\_ d. any felony if defendant has two or more convictions for a crime set forth in a-c above or for an offense under state or local law that would qualify under a, b, or c if federal jurisdiction were present, or a combination or such offenses;

\_\_\_\_\_ e. any felony not otherwise a crime of violence that involves a minor victim or the possession or use of a firearm or destructive device (as defined in 18 U.S.C. § 921), or any other dangerous weapon, or involves a failure to register under 18 U.S.C. § 2250;

  X   f. serious risk defendant will flee;

\_\_\_\_\_ g. serious risk defendant will (obstruct or attempt to obstruct justice) or (threaten, injure, or intimidate prospective witness or juror, or attempt to do so).

\_\_\_\_\_ 6. Government requests continuance of \_\_\_\_\_ days for detention hearing under § 3142(f) and based upon the following reason(s):

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
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7. Good cause for continuance in excess of three days exists  
in that:

Dated: January 23, 2014

Respectfully submitted,

ANDRÉ BIROTTE JR.  
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